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Attorneys for Complainant

**BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:  
**INGRID WHITAKER ROULSTON, a.k.a.  
INGRID ROULSTON**  
1571 N. Lowery Street  
Porterville, California 93257-1099  
Registered Nurse License No. 628828  
Respondent.

Case No. 2008-193

**ACCUSATION**

Ruth Ann Terry, M.P.H., R.N. ("Complainant") alleges:

**PARTIES**

1. Complainant brings this Accusation solely in her official capacity as the Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.

**Registered Nurse License**

2. On or about November 4, 2003, the Board of Registered Nursing issued Registered Nurse License Number 628828 to Ingrid Whitaker Roulston ("Respondent"), also known as Ingrid Roulston. The registered nurse license will expire on December 31, 2008, unless renewed.

**STATUTORY PROVISIONS**

3. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a

1 temporary or an inactive license, for any reason provided in Article 3 (commencing with Code  
2 section 2750) of the Nursing Practice Act.

3 4. Code section 2764 provides, in pertinent part, that the expiration of a  
4 license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding  
5 against the licensee or to render a decision imposing discipline on the license. Under Code  
6 section 2811, subdivision (b), the Board may renew an expired license at any time within eight  
7 years after the expiration.

8 5. Code section 2761 states, in pertinent part:

9 The board may take disciplinary action against a certified or licensed nurse  
10 or deny an application for a certificate or license for any of the following:

11 (f) Conviction of a felony or of any offense substantially related to the  
12 qualifications, functions, and duties of a registered nurse, in which event the  
record of the conviction shall be conclusive evidence thereof.

### 13 COST RECOVERY

14 6. Code section 125.3 provides, in pertinent part, that the Board may request  
15 the administrative law judge to direct a licensee found to have committed a violation or  
16 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
17 and enforcement of the case.

### 18 CAUSE FOR DISCIPLINE

19 7. Respondent has subjected her license to discipline under Code section  
20 2761, subdivision (f), in that Respondent has been convicted of a crime that is substantially  
21 related to the qualifications, functions, and duties of a registered nurse. On February 9, 2006, in  
22 the Superior Court, County of Tulare, in the matter entitled *People vs. Ingrid Roulston* (Super.  
23 Ct. Tulare Cty., 2005, Case No. PCM146802), Respondent was convicted by a jury of violating  
24 Penal Code section 368, subdivision (c) (inflicting injury on a dependent adult), a misdemeanor.  
25 The circumstances of the crime are that on April 9, 2005, while on duty as a registered nurse at  
26 the Porterville Developmental Center, Porterville, California, Respondent struck a client on the  
27 face with her open hand.

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1 PRAYER

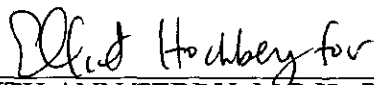
2 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
3 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

4 1. Revoking or suspending Registered Nurse License Number 628828, issued  
5 to Ingrid Whitaker Roulston, also known as Ingrid Roulston;

6 2. Ordering Ingrid Whitaker Roulston, also known as Ingrid Roulston to pay  
7 the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this  
8 case, pursuant to Code section 125.3; and,

9 3. Taking such other and further action as deemed necessary and proper.

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11 DATED: 12/18/07

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14 RUTH ANN TERRY, M.P.H., R.N.  
15 Executive Officer  
16 Board of Registered Nursing  
17 Department of Consumer Affairs  
18 State of California  
19 Complainant  
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